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ELECTRONICALLY FILED

April 22, 2020

The Honorable Mary Kay Vyskocil United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

DATE FILED: 4/22/2020

DOC #:

USDC SDNY DOCUMENT

Re: <u>United States v. Rebecca Linke</u>, *et al.* 20 CR 160 (MKV)

Dear Judge Vyskocil:

I represent Defendant Rebecca Linke, and submit this letter motion on her behalf seeking a modification of the travel limits of her bail as set forth below. The Government, by AUSA Sarah Mortazavi, and the Pretrial Services Department, by PTSO Rena Olin, do not object to the requested modifications.

Ms. Linke was released on the day of her arrest, March 9, 2020, on a \$100,000 Personal Recognizance Bond cosigned by her parents. Her travel limits are the Southern and Eastern Districts of New York, and the District of New Jersey, where she lives. Ms. Linke has been fully compliant with all bail conditions at all times.

I respectfully request that her travel limitations be extended to include Pennsylvania during certain hours on Tuesdays, Wednesdays and Fridays. Ms. Linke currently works for a New Jersey farm that is a vendor at greenmarkets located at 6700 Essington Ave., Philadelphia (on Tuesdays and Wednesdays) from 5 a.m. to 11 a.m., and at 955 N. State St., Ephrata, PA, on Fridays from 11 a.m. to 5 p.m. In addition, Ms. Linke owns three polo ponies and requests permission to ride and practice them once weekly at Tinicum Park, 963 River Rd., Upper Black Eddy, PA, between 4:30 p.m. and dusk. (These are not racehorses, and the weekly practices are not competitive.)

Ms. Linke and I are available at any time for a conference, should the Court require additional information or have other questions. These locations and proposed

itinerary have already been provided to the Government and to Pretrial, neither of whom oppose the application, as noted above.

I thank the Court for its consideration.

Sincerely,

David Wikstrom

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GRANTED. It is ordered that the conditions of defendant's release are modified to permit travel to Philadelphia, Ephrata, and Upper Black Eddy, Pennsylvania, which are all within the Eastern District of Pennsylvania, on the days and for the purposes described in this letter. SO ORDERED.

Date: 4/22/2020

New York, New York

Mary Kay Voskocil

United States District Judge